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ATTORNEYS AT LAW

July 24, 2015

**VIA ECF**

Honorable Analisa Torres  
United States District Court  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Franklin Zamora, et al. v. One Fifty Fifty Seven Corp., et al.  
Civil Action No. 14-cv-8043 (AT)(HBP)

Peter D. Stergios  
Partner  
T. 212.609.6648  
F. 212.672.7777  
pstergios@mccarter.com

Dear Judge Torres:

We represent defendants in the above-referenced matter. We write with the consent of plaintiffs' counsel to request an additional extension of the stay for collective action notice pursuant to Your Honor's February 18, 2015, order. Due to unanticipated delays in assembling electronic payroll and time record data from vendors, the parties were unable to proceed with mediation scheduled for June 25, 2015.

Plaintiffs have now been provided with electronic data for some of the relevant time period. As well, additional information that plaintiffs have requested should soon be available. On this basis, the parties anticipate that mediation will take place in September. Accordingly, we respectfully ask that the stay be extended to October 2, 2015, and that the parties' status report also be submitted on or before that date.

Finally, fact discovery is currently scheduled to be completed by September 30, 2015. We also respectfully request a 6-month extension of the discovery deadline, as the parties have not engaged in formal fact discovery due to the mutual desire to resolve this case by mediation before engaging in costly and time-consuming discovery.

Respectfully Submitted,

/s/ Peter D. Stergios  
Peter D. Stergios

cc: Counsel of Record (via ECF)

GRANTED. The parties shall submit a joint status letter by **October 2, 2015**. All fact discovery shall be completed by **March 30, 2016**. The case management conference scheduled for October 14, 2015, is ADJOURNED to **April 13, 2016, at 4:00 p.m.**

In light of the stay requested by the parties, the Clerk of Court is directed to terminate the motion at ECF No. 27.

SO ORDERED.

Dated: July 24, 2015  
New York, New York

  
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ANALISA TORRES  
United States District Judge

McCarter & English, LLP  
245 Park Avenue  
New York, NY 10167  
T. 212.609.6800  
F. 212.609.6921  
www.mccarter.com

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